

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.	)	CASE NO. 1:08 CV 2755
	)	
Plaintiff,	)	JUDGE: LESLEY WELLS
	)	MAGISTRATE JUDGE: GREG
-vs.-	)	WHITE
	)	
SAP AMERICA, INC., et al.	)	<u>MOTION OF PLAINTIFF HODELL-</u>
	)	<u>NATCO INDUSTRIES, INC. FOR</u>
Defendants.	)	<u>LEAVE TO EXCEED PAGE LIMIT</u>

Pursuant to Local Rule 7.1(f), Plaintiff Hodell-Natco Industries, Inc. (“Hodell”), respectfully request leave to file a Brief in Opposition to the SAP Defendants’ Motion to Dismiss the First Amended Complaint (ECF #36) in excess of the twenty (20) page limit. Hodell’s Brief in Opposition will not be more than thirty (30) pages.

In support of this Motion, Hodell submits that the requested leave is required in order to adequately address the many arguments raised by the SAP Defendants’ Motion to Dismiss, which includes a complicated choice-of-law analysis and an attack on each of the claims plead in Hodell’s First Amended Complaint. While Hodell believes that Ohio law applies to the instant dispute, the leave to exceed the local page limitations is further required to address the application of Pennsylvania law undertaken by the SAP Defendants, where necessary, in reference to each of Hodell’s claims.

Hodell submits that the requested leave is sought in good faith, and will not prejudice any party. Hodell will endeavor to submit its Opposition in less than thirty (30) pages, but requests leave up to 30 pages so that its arguments may be adequately presented to the Court.

Respectfully submitted,

/s/ P. Wesley Lambert

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CERTIFICATE OF SERVICE

I hereby certify that on this 21<sup>st</sup> day of July, 2009, a copy of the foregoing Motion of Plaintiff Hodell-Natco Industries, Inc. for Leave to Exceed Page Limit was filed electronically. Parties may access this filing through the Court's electronic filing system.

/s/ P. Wesley Lambert

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